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July 23, 2020

VIA ECF AND ELECTRONIC MAIL

Honorable Shelley C. Chapman
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
Courtroom 623
New York, New York 10006

Re: *In re: Perforadora Oro Negro, S. de R.L. de C.V. et al.*, Case No. 18-11094 (SCC)
(Jointly Administered)

Dear Judge Chapman:

We write on behalf of Frederick J. Warren (“Mr. Warren”), a director and shareholder of Debtor Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V in the above-captioned action.

On June 3, 2019, Mr. Warren filed a Motion for Authorization to Use Evidence Produced in the Chapter 15 Proceeding in the above-captioned action (the “Motion”). *See* ECF No. 202. At the June 25, 2019 status conference, Your Honor took the Motion off the calendar. *See* Hr’g Tr., 40:2-5 (June 27, 2019), ECF No. 230. No further action was taken regarding the Motion by the Court, Mr. Warren, or the Parties to the Chapter 15. On November 12, 2019, Your Honor stayed the above-captioned action, *see* ECF No. 262, and the action currently remains subject to a stay. *See* Second So Ordered Stipulation (June 1, 2020), ECF No. 283. Mr. Warren now seeks to withdraw the Motion. Recognizing, however, that the action is stayed, we respectfully request that Your Honor permit Mr. Warren leave from the stay in order to file a Notice of Dismissal of the Motion, or alternatively, that Your Honor dismiss the Motion once the stay has been lifted.

For the Court’s awareness, Mr. Warren notes that, on May 11, 2020, he filed an application pursuant to 28 U.S.C. Section 1782 for an order to take discovery in aid of a foreign proceeding (the “Application”), in which he requested discovery for use in a proceeding under the North American Free Trade Agreement captioned *Grace v. United Mexican States*. *See* Ex Parte

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Application of Frederick J. Warren Pursuant to 28 U.S.C. § 1782 for an Order to Take Discovery in Aid of a Foreign Proceeding, *In re Ex Parte Application of Frederick J. Warren*, No. 1:20-mc-00208 (PGG) (S.D.N.Y. May 11, 2020), ECF No. 1. On June 11, 2020, the Application was granted. See Order, *In re Ex Parte Application of Warren*, No. 1:20-mc-00208-PGG (S.D.N.Y. June 11, 2020), ECF No. 15. The requested discovery concerns certain of Oro Negro's bondholders' collusion with Mexico to destroy Oro Negro and take over its rigs, along with Seadrill and Fintech's involvement therein. See Memorandum of Law in Support of Application, Ex. A-F, *In re Ex Parte Application of Warren*, No. 1:20-mc-00208-PGG (S.D.N.Y. May 11, 2020), ECF No. 3.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Serafina Concannon', with a stylized flourish extending to the right.

Serafina Concannon
David M. Orta

Attorneys for Frederick J. Warren

cc: Counsel of record (via ECF)